UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

MEI L. WANG, MICHAEL Y.J. WANG, CHUN FANG WANG.

Index No. 07cv05462 (BST)

Plaintiffs,

v.

#### ANSWER TO AMENDED COMPLAINT

CYR INTERNATIONAL, INC., CHEW YOUNG ROO AMERICA, INC. CYR USA, INC., CHEW YOUNG ROOM, INC., CHEW YOUNG ROOM, CHEW YOUNG ROO, EUN CHAN LIM,

Defend	lants.
	X

Defendants CYR INTERNATIONAL, INC., CYR USA, INC and EUN CHAN LIM, by its attorneys LITCHFIELD CAVO LLP, answering the amended complaint of the plaintiffs, states as follows:

- Deny any knowledge or information sufficient to form a belief as to each and every allegation contained in the paragraphs of the Complaint numbered, "1", "3", "5", "6", "7", "9" and "10".
- Deny each and every allegation contained in the paragraphs of the Complaint numbered "11" and "12".
- Answering defendant repeats each and every denial to each and every allegation
  of the complaint which is realleged in the paragraph numbered "13" thereof as hereinbefore
  denied.
- 4. Deny any knowledge or information sufficient to form a belief as to each and every allegation contained in the paragraphs of the Complaint numbered "14", "16", "18", "19", "21", "23", "24" and "28".

- 5. Deny each and every allegation contained in the paragraphs of the Complaint numbered "15", "17", "20", "22", "25", "26" and "27".
- Answering defendant repeats each and every denial to each and every allegation
  of the complaint which is realleged in the paragraph numbered "29" thereof as hereinbefore
  denied.
- Deny each and every allegation contained in the paragraphs of the Complaint numbered "30" and "31".
- 8. Answering defendant repeats each and every denial to each and every allegation of the complaint which is realleged in the paragraph numbered "32" thereof as hereinbefore denied.
- Deny each and every allegation contained in the paragraphs of the Complaint numbered "33" and "34".
- 10. Answering defendant repeats each and every denial to each and every allegation of the complaint which is realleged in the paragraph numbered "35" thereof as hereinbefore denied.
- Deny each and every allegation contained in the paragraphs of the Complaint numbered "36".
- 12. Answering defendant repeats each and every denial to each and every allegation of the complaint which is realleged in the paragraph numbered "37" thereof as hereinbefore denied.
- Deny each and every allegation contained in the paragraphs of the Complaint numbered "38" and "39".

- 14. Answering defendant repeats each and every denial to each and every allegation of the complaint which is realleged in the paragraph numbered "40" thereof as hereinbefore denied.
- Deny each and every allegation contained in the paragraphs of the complaint numbered "41".
- 16. Answering defendant repeats each and every denial to each and every allegation of the complaint which is realleged in the paragraph numbered "42" thereof as hereinbefore denied.
- Deny each and every allegation contained in the paragraphs of the complaint numbered "43".

#### AS AND FOR A FIRST AFFIRMATIVE DEFENSE

18. That the complaint fails to set forth facts sufficient to constitute a cause and/or causes of action upon which relief may be granted insofar as this defendant is concerned.

## AS AND FOR A SECOND AFFIRMATIVE DEFENSE

Plaintiffs lack personal jurisdiction over the defendants.

### AS AND FOR A THIRD AFFIRMATIVE DEFENSE

20. Additional facts may be revealed by future discovery that supports additional affirmative defenses presently available but unknown to answering defendants. Therefore, answering defendants reserve the right to assert additional defenses in the event that discovery and investigation indicate that additional defenses would be appropriate.

# WHEREFORE, these answering defendants pray that the Court:

- i. dismiss plaintiffs' claims
- ii. deny plaintiffs' prayer for an injunction
- iii. award defendants costs, disbursements and attorneys fees and
- iv. award defendants such other relief as the Court deems just and proper.

Dated: New York, New York August 9, 2007

rours, etc.

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